

No.

CR - 08 00938 JW

VT

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

THE UNITED STATES OF AMERICA

vs.

CHRISTIAN PANTAGES
and
JAMIE HARMON

SEALED BY ORDER
OF THE COURT

2008 DEC 31 P 12:57
RICHARD W. WIEKING
CLERK
U.S. DISTRICT COURT
NO. DIST. OF CA. S.J.

FILED

INDICTMENT

COUNT ONE:

Title 18, United States Code, § 371 - Conspiracy to Buy
Stolen Goods Constituting an Interstate Shipment;

COUNT TWO:

Title 18, United States Code, § 1956(h) - Conspiracy to
Launder Monetary Instruments;

COUNTS THREE
THROUGH SEVEN:

Title 18: U.S.C. § 1956(a)(1)(B)(I) - Laundering of
Monetary Instruments.

A true bill.

Ramona Willis

Foreperson

Filed in open court this 30th day of December

A.D. 2008

DOCUMENT NO	CSA's INITIALS
1.	
DISTRICT COURT CRIMINAL CASE PROCESSING	

[Signature]

United States Magistrate Judge

Bail, \$ NO BAIL WARRANTS
FOR BOTH DEFENDANTS

JOSEPH P. RUSSONIELLO (CASBN 44332)
United States Attorney

FILED

2008 DEC 31 P 12: 57

RICHARD W. WIEKING
CLERK
U.S. DISTRICT COURT
NO. DIST. OF CA. S.J.

SEALED BY ORDER
OF THE COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CR - 08 00938 JW

UNITED STATES OF AMERICA,

No.

Plaintiff,

v.

CHRISTIAN PANTAGES, and
JAMIE HARMON,

Defendants.

VIOLATIONS: 18 U.S.C. § 371-Conspiracy
to Buy Stolen Goods Constituting an
Interstate Shipment; 18 U.S.C. § 1956(h)-
Conspiracy to Commit Money Laundering;
18 U.S.C. § 1956(A)(i)(b)(i)- Engaging in
Monetary Transaction in Criminally Derived
Property; 18 U.S.C. § 2-Aiding and
Abetting

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges:

BACKGROUND

At all times relevant to this Indictment:

1. During the period from September 1, 2003 to December 31, 2003 Defendant Christian Pantages was doing business as Silicon Valley Resale ("SVR"), 2526 Seaboard Ave., San Jose, CA, and shared control of this entity with Yan Ebyam.

2. Defendant Christian Pantages and Yan Ebyam bought and sold computer equipment under the business name of "SVR."

3. During the period from September 25, 2003 to December 25, 2003 Defendant

INDICTMENT

1 Christian Pantages was an "authorized signer" for Bank of America account #12629-06802 that
2 was maintained in the name of "SVR."

3 4. Watkins Motor Lines ("Watkins") was a transport business with a facility in San
4 Jose, California. Watkins engaged in the interstate transport of goods.

5 COUNT ONE: (18 U.S.C. §§ 371 - Conspiracy to Buy Stolen Goods Constituting An
6 Interstate Shipment)

7 5. The factual allegations in paragraphs 1 through 4 are re-alleged and incorporated
8 herein as if set forth in full.

9 6. Beginning on a date unknown, but by no later than in or about September 1, 2003,
10 and continuing to on or about December 31, 2003, in the Northern District of California and
11 elsewhere, the defendant,

12 CHRISTIAN PANTAGES,

13 and others known and unknown to the Grand Jury, did knowingly combine, conspire, and agree
14 with each other to commit offenses against the United States, that is, the defendant and others,
15 conspired to unlawfully buy stolen goods being shipped by an interstate freight carrier, namely
16 Watkins Motor Lines, in violation of Title 18, United States Code, Section 659.

17 MANNER AND MEANS OF THE CONSPIRACY

18 7. It was part of the conspiracy that the defendant Christian Pantages and Yan
19 Ebyam purchased "high-tech" equipment that they knew had been stolen from Watkins.

20 8. It was further part of the conspiracy that defendant Christian Pantages assisted in
21 the repackaging of the stolen "high-tech" equipment into unmarked plain white shipping cartons
22 before it was resold it to other persons and businesses under the guise of SVR.

23 9. It was further part of the conspiracy that the defendant Christian Pantages, in an
24 attempt to conceal the source of the stolen "high-tech" equipment, generated large sums of
25 currency by conducting numerous cash withdrawals of funds from Bank of America Account
26 No.12629-0680.

27 OVERT ACTS

28 10. In furtherance of the conspiracy, and to achieve its objects, defendant Christian
Pantages committed the following overt acts, among others, in the Northern District of California

1 and elsewhere:

2 a. On October 2, 2003, defendant Christian PANTAGES sent an "e-mail" to
3 Lumarc Computer in Rochester, New York, directing Lumarc Computer to change the name on
4 their purchase order to SVR's partner Coastside Networking.

5 b. On November 4, 2003, defendant Christian PANTAGES cashed a
6 \$9,750.00 check from Lumarc Computer at the ECL Market located in Santa Clara, California..

7 c. On or about November 12, 2003, defendant Christian Pantages endorsed
8 both a \$13,000.00 AtlanTech Resellers' check and a \$4,300.00 Coastside Networking check and
9 deposited these checks to SVR's account located at the Bank of America.

10 d. On or about November 14, 2003, defendant Christian Pantages issued
11 SVR check #1387 payable to himself in the amount of \$3,350.00.

12 e. On or about November 15, 2003, defendant Christian Pantages issued
13 SVR check #1388 payable to Andrea Harry in the amount of \$10,000.00.

14 f. On or about December 3, 2003, defendant Christian Pantages endorsed a
15 \$65,000.00 check from Atlantix Global Systems that was made payable to SVR and deposited it
16 to SVR's account located at the Bank of America.

17 g. On or about December 10, 2003, defendant Christian Pantages endorsed a
18 \$47,500.00 check from Lumarc Computer Corp. that was made payable to "SVR" and deposited
19 it to SVR's account located at the Bank of America.

20 h. On December 10, 2003, defendant Christian Pantages made six (6)
21 separate cash withdrawals from SVR's account located at the Bank of America, totaling
22 \$71,000.00 from six (6) different branches of the Bank of America.

23 i. On December 19, 2003, defendant Christian Pantages made a \$110,000.00
24 cash withdrawal from SVR's account located at the Bank of America.

25 All in violation of Title 18, United States Code, Section 371.

26 COUNT TWO: (18 U.S.C. § 1956(h) Conspiracy to Launder Monetary Instruments)

27 The factual allegations in paragraphs 1 through 4 are re-alleged and incorporated herein as if set
28 forth.

1 11. On or about and between December 20, 2003 and March 2, 2004, in the County of
2 Santa Clara, in the Northern District of California, and elsewhere, defendants,

3 CHRISTIAN PANTAGES,

4 and

5 JAMIE HARMON,

6 and others known and unknown to the Grand Jury, knowing that the property involved in certain
7 financial transactions represented the proceeds of some form of unlawful activity, did knowingly
8 and intentionally conspire to conduct financial transactions affecting interstate commerce which
9 in fact involved the proceeds of specified unlawful activity, that is, theft from interstate
10 shipments by a common carrier, in violation of Title 18, United States Code, Section 659,
11 knowing that the transactions were designed at least in part to conceal and disguise the nature,
12 the location, the source, the ownership, and the control of the proceeds of the specified unlawful
13 activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

14 All in violation of Title 18, United States Code, Section 1956(h).

15 OVERT ACTS

16 12. In furtherance of the conspiracy, and to achieve its objects, defendants Christian
17 Pantages, and Jamie Harmon committed the following overt acts, among others, in the Northern
18 District of California and elsewhere:

19 a. On or about December 23, 2003, defendant Christian Pantages signed for a
20 FedEx envelope that was addressed to "Yan Ebyam" from Alta Tech.

21 b. On or about December 23, 2003, defendant Pantages caused his wife,
22 Ingrid Pantages (Harry) to sign for a FedEx envelope that was addressed to "Yan Ebyam" from
23 Technology Development Center ("TDC").

24 c. On or about December 23, 2003, defendant Christian Pantages endorsed
25 both Alta Tech check #024658 (\$42,300.00) and U.S. Bank cashier's check #511773210
26 (\$85,250.00) purchased by "TDC" and made them "Pay to the Order of Jamie Harmon."

27 d. On or about December 24, 2003, defendant Jamie Harmon deposited Alta
28 Tech #024658 and U.S. Bank cashier's check #511773210 into South Valley National Bank

1 (“SVNB”) account #51043-040 (Law Office of Jamie Harmon Attorney-Client Trust account).

2 e. On or about December 30, 2003, defendant Jamie Harmon issued a
3 \$15,000.00 check (#1111) from her “Trust Account (SVNB account #51043-040) that was made
4 payable to “Ingrid Harry”.

5 f. On or about December 30, 2003, defendant Pantages caused his wife,
6 Ingrid Pantages (Harry) to endorse SVNB check #1111 and deposit it into Bank of America
7 account #01755-17273; this account was maintained in the name of “Ingrid Harry.”

8 g. On or about January 7, 2004, defendant Jamie Harmon directed three
9 consecutively numbered \$10,000.00 checks (#1112, 1113 & 1114) to be issued from her Trust
10 Account (SVNB account #51043-040).

11 h. On or about January 9, 2004, defendant Pantages caused his wife, Ingrid
12 Pantages(Harry) to endorse SVNB check numbers 1112, 1113 and 1114 and deposit them into
13 Bank of America account #01755-17273; this account was maintained in the name of “Ingrid
14 Harry”.

15 i. On or about February 4, 2004, defendant Jamie Harmon wrote a
16 \$54,050.00 check (#1120) from her “Trust Account” (SVNB account #511773210 payable to
17 “Christian Pantages.”

18 j. On or about February 5, 2004, SVNB check #1120 was endorsed by
19 defendant Christian Pantages and then used to obtain \$4,010.00 in cash and purchase five (5)
20 consecutively numbered \$10,000.00 SVNB Official Checks (check numbers 284355805,
21 284355806, 284355807, 284355808, and 284355809); these Official Checks were all purchased
22 by the “Law Offices of Jamie Harmon” and made payable to “Ingrid Harry.”

23 k. On or about February 5, 2004, defendant Ingrid Pantages (Harry) endorsed
24 SVNB “Official Check” numbers 284355807 and 284355808, and deposited these two “Official
25 Checks into Bank of America account #0175-17273; when making this deposit Ingrid Pantages
26 received cash back” of \$10,000.00.

27 l. On or about February 6, 2004, defendant Pantages caused his wife, Ingrid
28 Pantages (Harry) to endorse and “cashed” SVNB Official Check #284355806.

1 m. On or about February 17, 2004, defendant Pantages caused his wife, Ingrid
2 Pantages (Harry) to endorse SVNB Official Checks #284355809 and deposit it into her Bank of
3 America account #0175-17273.

4 n. On or about March 1, 2004, defendant Ingrid Pantages (Harry) endorsed
5 "SVNB" Official Check number 284355805 and deposited it into Bank of the West account
6 #008-125104, jointly maintained in the names of Ingrid & Christian Pantages.

7 COUNTS THREE THROUGH SEVEN: (18 U.S.C. § 1956(A)(i)(b)(i)—Laundering of
8 Monetary Instruments)

9 The factual allegations contained in paragraphs 1 through 12 of this Indictment are
10 realleged as though set forth herein.

11 13. On or about the dates set forth below, in the Northern District of California
12 and elsewhere, the defendant,

13 JAMIE HARMON,

14 did knowingly and willfully conduct and attempt to conduct a financial transaction affecting
15 interstate commerce as described below which involved the proceeds of a specified unlawful
16 activity, knowing that the transaction was designed in whole and in part to conceal and disguise
17 the nature, location, source, ownership, and control of the proceeds of specified unlawful activity,
18 and that while conducting and attempting to conduct such a transaction, knew that the property
19 involved in the financial transactions that is funds and monetary instruments, represented the
20 proceeds of some form of unlawful activity.

Count	Date	Financial Transaction	Amount
3	January 7, 2004	Issued Check #1112 from Silicon Valley National Bank Acct. #51043-040 payable to Ingrid Harry	\$10,000
4	January 7, 2004	Issued Check #1113 from Silicon Valley National Bank Acct. #51043-040 payable to Ingrid Harry	\$10,000

5	January 7, 2004	Issued Check #1114 from Silicon Valley National Bank Acct. #51043-040 payable to Ingrid Harry	\$10,000
6	January 7, 2004	Issued Check #1115 from Silicon Valley National Bank Acct. #51043-040 payable to Ingrid Harry	\$ 3,000
7	February 4, 2004	Issued Check #1120 from Silicon Valley National Bank Acct. #51043-040 payable to Christian Pantages	\$54,050

All in violation of Title 18, United States Code, Sections 1956(A)(1)(b)(i) and 2.

DATED: 12/31/08

A TRUE BILL.


FOREPERSON

JOSEPH P. RUSSONIELLO
United States Attorney


MATTHEW A. PARRELLA
Chief, San Jose Branch Office

(Approved as to form: )
FDC AUSA RICHARD CHENG

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

Count 1- 18 USC § 371-Conspiracy to Buy Stolen Goods
 Constituting an Interstate Shipment;
 Count 2- 18 USC § 1956(h)- Conspiracy to Launder
 Monetary Instruments;
 Counts Three through Seven 18 USC § 1956(a)(1)(B)(i)-
 Laundering of Monetary Instruments

☐ Petty
☐ Minor
☐ Misde-
 meanor
☒ Felony

PENALTY:

SEALED BY ORDER
 OF THE COURT

CR-08

ORIGINAL
 FILED

Name of District Court, and/or Judge/Magistrate Location

08 DEC 31 PM 12:58
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

RICHARD W. WIEKING

DEFENDANT - U.S.
 DISTRICT COURT
 NO. DISTRICT COURT

CHRISTIAN PANTAGES

DISTRICT COURT NUMBER

00938

SEAL
 OF THE COURT

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Special Agent Anthony Gregory - ICE

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW
 DOCKET NO.

☐ this prosecution relates to a
 pending case involving this same
 defendant

MAGISTRATE
 CASE NO.

☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

Name and Office of Person
 Furnishing Information on this form JOSPEH P. RUSSONIELLO

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned) RICHARD CHENG

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior
 summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction

☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
 been filed? ☐ No

If "Yes"
 give date
 filed

DATE OF
 ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
 TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT ☐ SUPERSEDING ☐ INFORMATION

ORIGINAL
FILED

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OFFENSE CHARGED

Count 1- 18 USC § 371-Conspiracy to Buy Stolen Goods
Constituting an Interstate Shipment;
Count 2- 18 USC § 1956(h) - Conspiracy to Launder
Monetary Instruments;
Counts Three through Seven 18 USC § 1956(a)(1)(B)(i)-
Laundering of Monetary Instruments

☐ Misdemeanor
☒ Felony

08 DEC 31 PM 12: 57

SAN JOSE DIVISION

PENALTY:

SEE ATTACHMENT

RECEIVED BY DEFENDANT - U.S.
CLERK
U.S. DISTRICT COURT
JAMIE HARMON

SEALED BY ORDER
OF THE COURT

DISTRICT COURT NUMBER

CR-08 00938

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Special Agent Anthony Gregory - ICE

☐ person is awaiting trial in another Federal or State Court,
give name of court

☐ this person/proceeding is transferred from another district
per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
charges previously dismissed
which were dismissed on motion
of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW
DOCKET NO.

☐ this prosecution relates to a
pending case involving this same
defendant

MAGISTRATE
CASE NO.

☐ prior proceedings or appearance(s)
before U.S. Magistrate regarding this
defendant were recorded under

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) ☒ If not detained give date any prior
summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
been filed? ☐ No

If "Yes"
give date
filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

Name and Office of Person

Furnishing Information on this form JOSEPH P. RUSSONIELLO

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.
Attorney (if assigned)

RICHARD CHENG

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or
warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

Defendants:

Christian PANTAGES

Jamie HARMON

Maximum Penalties:

Count 1: 18 U.S.C. § 371 Conspiracy To Buy Stolen Goods
Constituting an Interstate Shipment

Class D Felony

- A. Five years custody
- B. \$250,000 fine
- C. 3 years supervised release
- D. \$100 mandatory special assessment

Count 2: 18 U.S.C. § 1956(h) - Conspiracy to Launder Monetary Instruments

Class C Felony

- A. Ten years custody
- B. \$250,000 fine (or twice the amount of the criminally derived property involved in the transaction)
- C. 3 years supervised release
- D. \$100 mandatory special assessment

Counts 3 - 7: 18 U.S.C. § 1956(a)(1)(B)(i) - Laundering of Monetary Instruments

Class B Felony

- A. Twenty years custody
- B. \$500,000 fine (or twice the amount of the criminally derived property involved in the transaction)
- C. 5 years supervised release
- D. \$100 mandatory special assessment

Defendants:

Christian PANTAGES
Jamie HARMON

Maximum Penalties:

Count 1: 18 U.S.C. § 371 Conspiracy To Buy Stolen Goods
 Constituting an Interstate Shipment

Class D Felony

- A. Five years custody
- B. \$250,000 fine
- C. 3 years supervised release
- D. \$100 mandatory special assessment

Count 2: 18 U.S.C. § 1956(h) - Conspiracy to Launder Monetary Instruments

Class C Felony

- A. Ten years custody
- B. \$250,000 fine (or twice the amount of the criminally derived property
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- C. 3 years supervised release
- D. \$100 mandatory special assessment

Counts 3 - 7: 18 U.S.C. § 1956(a)(1)(B)(i) - Laundering of Monetary Instruments

Class B Felony

- A. Twenty years custody
- B. \$500,000 fine (or twice the amount of the criminally derived property
 involved in the transaction)
- C. 5 years supervised release
- D. \$100 mandatory special assessment